

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA**

THOMAS E. PEREZ, Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

EL TEQUILA, LLC, and
CARLOS AGUIRRE, Individually,

Defendants.

Case No. 12-CV-00588-JED-PJC

DEFENDANTS' MOTION TO COMPEL DISCOVERY

COME NOW the Defendants and in support of this Motion to Compel Discovery allege and state:

1. Defendants propounded written discovery to the Plaintiff.
2. Plaintiff objected to all discovery based on certain asserted privileges.
3. Plaintiff provided partial and incomplete responses.
4. Defendants file this Motion requesting the Court to compel the Plaintiff to properly respond to the discovery.
5. Defense counsel has conferred in good faith with Plaintiff's counsel regarding these discovery disputes. The attorneys were unable to resolve the disputes.
6. Defendants simultaneously file their Brief in Support of the Motion to Compel Discovery.

WHEREFORE, Defendants pray the Court to grant the Motion to Compel Discovery,
together with attorney fees and costs.

Respectfully submitted,

WILKINSON LAW FIRM

By: s/ Bill Wilkinson
Bill V. Wilkinson, OBA No. 9621
4812 East 81 Street #302
Tulsa OK 74137
Tel: 918/663-2252; Fax: 918/663-2254

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of July 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Matthew P. Sallusti
U.S. DEPARTMENT OF LABOR
525 Griffin Street #501
Dallas TX 75202
ATTORNEY FOR PLAINTIFF

s/ Bill Wilkinson
Bill V. Wilkinson